

EXHIBIT C

In The Matter Of:

BLUE SPIKE, LLC

v.

TEXAS INSTRUMENTS, et al.

AHMED TEWFIK, Ph.D. - Vol. 1

June 15, 2015

CONFIDENTIAL
ATTORNEYS' EYES ONLY

MERRILL CORPORATION

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

BLUE SPIKE, LLC,	\$	
	\$	
VS.	\$	CASE NO.
	\$	6:12-CV-00499-MHS-CMC
TEXAS INSTRUMENTS, INC.,	\$	
et al.	\$	
Defendants.	\$	

ORAL AND VIDEOTAPED DEPOSITION OF
AHMED TEWFIK, Ph.D

JUNE 15, 2015

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ORAL AND VIDEOTAPED DEPOSITION OF AHMED
TEWFIK, Ph.D, produced as a witness at the instance of
the Defendant, and duly sworn, was taken in the
above-styled and numbered cause on the 15th day of June
2015, from 9:03 a.m. to 4:41 p.m., before Caroline
Chapman, CSR in and for the State of Texas, reported by
Computerized Stenotype Machine, Computer-Assisted
Transcription, at the Law Offices of Vinson & Elkins
LLP, 2801 Via Fortuna, Suite 100, Austin, Texas,
pursuant to the Federal Rules of Civil Procedure.
SF-043369

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1 Q. Okay. And beyond MFCCs, you don't point to any 10:38

2 other structure as being the alleged abstract in Audible 10:38

3 Magic's products, correct? 10:38

4 A. That is my recollection. 10:38

5 Q. Okay. 10:38

6 A. Now I am trying to remember, because there were 10:38
7 other characteristics mentioned -- in some of the 10:39
8 literature I had reviewed. But again, without going 10:39
9 through reading the whole report, which is probably not 10:39
10 what you want me to do at this point, I think that the 10:39
11 MFCC was the main aspect I focused on. 10:39

12 Q. All right. Do you believe that there is 10:39
13 anything inventive about Blue Spike's patents, do you 10:39
14 have a view of a topic? 10:39

15 A. Well, again, I answered this question in the 10:39
16 previous hour, meaning that, when I produced this report 10:39
17 I presumed that the inventions were valid. And I did 10:39
18 not take the time to look at whether there were -- there 10:39
19 was prior art that existed that replicated this 10:39
20 invention or there existed prior art that we put together 10:39
21 to come -- where it was obvious for someone skilled in 10:39
22 the art to understand this. So that's not something 10:40
23 that I opined on. And I did not take the time to look 10:40
24 at where the state of the art was back at the time that 10:40
25 the patents were filed and issued. 10:40